

Community Eligibility Provision: Tips for Success in Year 1

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Today's Topics

- * Overview of CEP evaluation results
- * Road trip to a successful implementation
- * Testimonials and success stories from early adopting States
- * Q+A

Program Evaluation: Design Overview

- * Congressionally mandated program evaluation of the Community Eligibility Provision (CEP), published February 2014
- * The evaluation included two key components: an implementation study and an impact study
- * Examined CEP in the first 7 implementing States (IL, KY, MI, DC, OH, NY, WV)

What Were We Trying to Learn?

The evaluation
was
conducted to
obtain a better
understanding
of:

- The acceptability of CEP to LEAs
- Barriers for LEA adoption of CEP
- Operational issues in administering CEP
- Impacts of electing CEP

Evaluation Design: Implementation Study

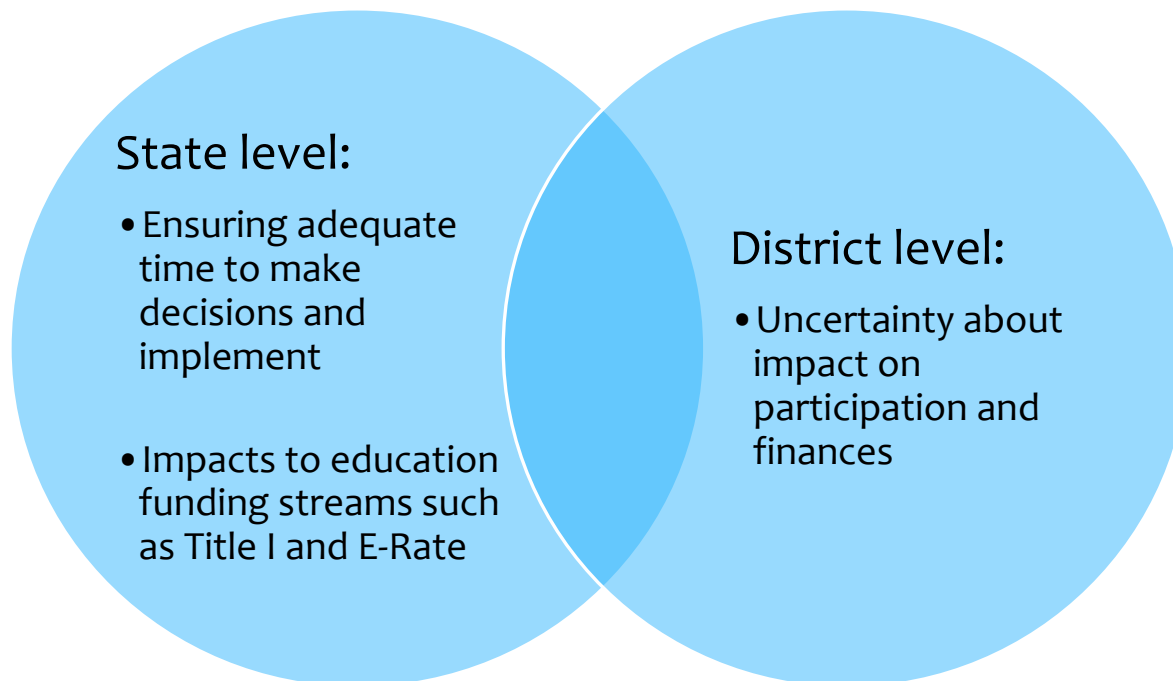
- * The Implementation study was designed to identify the characteristics of CEP schools as well as challenges and incentives to CEP adoption. It included:
 - * Collection of State administrative data between SYs 2009-10 and 2012-13, analyzing LEAs and three categories:
 - * Participating in CEP
 - * Eligible but not participating in CEP
 - * Near-eligible to participate in CEP
 - * Survey of 1,322 LEAs in the seven Year 1 & 2 States
 - * State agency director & staff interviews in the seven Year 1 & 2 States
 - * Interviews of Title I directors in all 51 State Educational Agencies

Results: Implementation Study

- * A large number of eligible districts chose to elect CEP
- * All seven of the States implementing CEP for two or more years experienced **rapid second year growth** in the number of eligible districts participating in CEP.
- * Characteristics of participating districts include:
 - * High percentage of identified students (positive relationship between ISP and participation in CEP)
 - * Tended to be smaller (less than 2,500 students enrolled)
 - * Higher percentages of students in grades K-5
 - * Average free and reduced percentage of 75%
 - * Previously participating in provisions 2 and 3

Results: Implementation Study

- * The evaluation identified the following barriers to participation in CEP at the State and district levels:



Evaluation Design: Impact Study

- * The Impact Study estimated CEP impacts on NSLP and SBP participation, Federal reimbursements, and program errors. It included:
- * Collection and analysis of State administrative data from the fall months for SY 2009–10 through 2012–13 on 285 participating LEAs and 528 matched non-participating LEAs
- * A series of smaller data collections:
 - * Web survey of LEAs
 - * Interviews with LEAs on staffing and administrative costs
 - * Review of certification records
 - * Cashier observations
 - * Review of LEA records on meal claiming data

Results: Impact Study

- * On average, **CEP increased both program participation levels and Federal reimbursements in the NSLP and SBP:**

Average daily participation rates

- NSLP: **+5 percent**
- SBP: **+9 percent**

Average per meal reimbursements

- NSLP: **+6 percent**
- SBP: **+2 percent**

Results: Impact Study

- * CEP had **no adverse effect on foodservice revenues**, possible net increase
- * CEP reduced the overall rate of certification errors
- * CEP reduced administrative burdens and generated net time savings for:
 - * LEA foodservice administrative staff
 - * School foodservice workers
 - * School administrators

Big Picture Results

- * Overall, the evaluation indicated that CEP works
- * CEP has a clear and positive impact on participation and reimbursements
- * LEAs highly satisfied, likely to continue participating in CEP

Road Trip to a Successful Implementation of the Community Eligibility Provision



Rest Stop 1: Fuel Up

Figure out the Numbers!

Election Level

- * Ensuring financial viability is key when electing CEP
- * Districts may participate in CEP for an individual school, a group of schools, or districtwide.
- * The evaluation found that the average identified student percentage was around 55% or higher

Election level flexibilities

- * Individual school election
 - * Allows districts to try out CEP
- * Grouping
 - * Provides flexibility to add in schools to avoid parent confusion
 - * Brings schools with lower ISPs into CEP
- * Districtwide
 - * Operationally efficient
 - * Easier for parent acceptability

Calculating Percentages

$$\text{Identified Student \%} = \frac{\text{\# of Identified Students}}{\text{Total \# of enrolled students with access to NSLP/SBP}} \times 100$$

$$\text{Claiming \%} = \text{Identified Student \%} \times 1.6$$

- * Identified student percentages must not be rounded
- * The claiming percentage that determines the percent of meals claimed at the federal free rate should be rounded to 2 decimal points.

Maximizing Identified Student Percentages

- * Ensure that direct certification data is coming from all possible sources
 - * SNAP, TANF, and FDPIR participation records
 - * Homeless, migrant, or runaway youths certified through documentation provided by applicable program liaisons
 - * Participation rolls for Head Start, and pre-K Even Start
 - * Foster children certified through means other than an application
 - * Students certified through the SNAP letter method

Decision

- * How is the level of Federal reimbursement under CEP different?
- * Use the USDA estimator to assess the level of Federal reimbursement under CEP
- * Works like Provision 2/3: the difference between the cost of serving all students free meals and the Federal reimbursement received must be covered

Rest Stop # 2: Stretching the legs

Communication

Stakeholders

- * Include all stakeholders in conversations about CEP
 - * School administrators/board members
 - * School food service staff and/or food service vendors
 - * Title I and State Educational Agency contacts
 - * State nutrition contacts
 - * PTA representatives
 - * Other groups that may be impacted by your decision to elect CEP

Title I

- * U.S. Department of Education guidance on how LEAs can successfully implement Title I requirements while operating CEP
- * FNS policy memo SP-19-2014, “Community Eligibility Provision: Department of Education Title I Guidance” and may be accessed at <http://www.fns.usda.gov/sites/default/files/SP19-2014os.pdf>
- * There are many options potentially available to LEAs for meeting Title I data requirements! Consult with your State agency to determine which solutions are available and/or preferred

E-Rate

- * The Federal Communications Commission (FCC) has also released guidance on Federal Funding for the E-Rate program, available here:
<http://www.fcc.gov/document/universal-service-administrative-company-3>
- * Currently, schools utilizing CEP may use the NSLP eligibility data that they previously submitted for the most recent funding year in which they did not participate in CEP

Alternative Household Income Surveys

- * Some States/LEAs may determine alternate household income survey data are needed for State and local education funding determinations
- * These alternative household income surveys are *not* school meal applications and the costs associated cannot be charged to the foodservice account
- * These survey forms can be MUCH SIMPLIER than school meal program applications:
 - * Application only needs to establish size of household and income level
 - * A check-box list of Income ranges (e.g., “\$20,000-\$30,000”) can be used, rather than asking for report of exact income on a bi-weekly, monthly, or annual basis
 - * Fields such as last four digits of SSN and child status (homeless, migrant, etc.) may be dropped

Alternative Household Income Surveys

- * Some States/LEAs may still wish to employ a format very similar to the school meal applications for the following reasons:
 - * Student information systems in place are likely pre-positioned to process or accept data from this document format
 - * Ensures consistency/equity of data classification statewide
 - * USDA Income Eligibility Guidelines and USDA guidance as still broadly applicable and possibly useful in staff training context

Alternative Household Income Survey Do's and Don'ts

* Do

- * Add prominent disclaimer to survey that it is not a free and reduced price application
- * Include clear, concise explanation of why collecting household income data is important for the school and for children
- * If the new income survey uses the same format as those previously used for school meal applications, scrub all references to USDA programs or “meals”
- * Seek your State Department of Education’s (or Title I coordinator’s) input to ensure that the income survey will collect all necessary information

* Do Not

- * State or imply that completion of the income form is in any way contingent upon receipt of free school meals
- * Package the household income survey with materials related to the school meal programs
- * Use foodservice funds to cover the costs associated with these surveys

Rest Stop 3: Grabbing a bite to eat

Education and Operations

Educate Your Households

- * The switch to CEP may be a significant one for parents, especially if they are used to filling out applications each year
- * Participating LEAs have reported that notifying households early and often about CEP and explaining its benefits is very important to minimize confusion at the start of the school year
- * Place CEP notifications prominently on websites and in any “back to school” packets/emails sent to households, hold an information session, or provide information at school board meetings or back to school nights. Get your LEAs top officials and spokespeople involved in messaging
- * This is especially critical for LEAs that are not electing district-wide, as households may be sending children to CEP schools and non-CEP schools at the same time

Expanded School Breakfast Service

- * The simplified counting and claiming of CEP facilitates expanded service delivery methods available in the SBP
- * Expanding school breakfast service typically boosts SBP participation, and potentially Federal reimbursements
- * Because money no longer changes hands for reimbursable meals, point of service is lowered as a barrier to implementation

Expanded School Breakfast Service

- * Expanded service delivery methods include:
 - * Breakfast in the Classroom
 - * Grab 'n' Go
 - * Breakfast After 1st Period
 - * Breakfast on the Bus
- * USDA offers extensive guidance for LEAs interested in expanding SBP; a set of toolkit resources is available at: <http://www.fns.usda.gov/sbp/toolkit>

Train Your Staff

- * Conduct trainings for staff members, especially those at point of service locations such as cash registers
- * Train office or administrative staff on updated procedures for recordkeeping, reporting, or alternative data collection
- * Make sure teachers are aware of CEP benefits, and what universal meal service potentially means for students; if applicable, provide additional training if school faculty will be responsible for counting meals in classroom service settings

Counting and Claiming Meals

- * Ensure that only the total number of reimbursable meals served daily; there are no longer any reimbursement categories
- * Meals must still be counted at point of service; schools are still responsible to count reimbursable meals only
- * Many early implemented States set up systems only requiring meal counts to be entered and the CEP percentages were applied automatically

Um, are we there????

YES!

Testimonials and Success Stories

- * Jan Miller, Springfield School District (IL) on positives of participating in CEP
 - * “Not having to approve free/reduced lunch applications. My assistant does not have to spend the first two months of school approving lunch applications along with spending time on the phone trying to get the correct information from the parents. She now spends that time visiting the schools. My managers at the schools are also saving time because they are not constantly trying to get applications or money from the students and parents.”
 - * “Being able to spend more time on production and menus instead of approving applications and collecting charges.”

Testimonials and Success Stories

- * Georia Marshall, Murphysboro CUSD 186 (IL) on CEP benefits
 - * “End of the year balances for lunch charges are a thing of the past!”
- * On barriers to CE participation
 - * “Mainly from the community not completely understanding [CEP]. First parents were confused thinking “How can Illinois afford this? How much will our taxes going to go up?” [...] Information was provided to students to take home explaining this option, information was presented during back to school events. It definitely took a while for parents to understand. [...] Over time the community and parents have definitely embraced this program. I know that the cafeteria staff LOVE it.”

Testimonials and Success Stories

- * Lindsey Palmer, RD, LD, School Programs Manager, Office of the State Superintendent of Education (DC)
- * “DC has nothing but great things to report with regards to CEP. All of our SFAs or school sites that are over 80% free have opted into the program and well as a number of SFAs grouping schools with high and low ISP to maximize their free percentage as well as get as many schools CEP as possible. DC even has SFAs who are not eligible for the program asking how they can participate, they are that interested in the benefits.”

Testimonials and Success Stories

- * Larry Spring, Superintendent, Schenectady School District (via Sandra Sheedy, New York Education Department)
 - * “He [Larry] could focus his efforts on food insecure students and provide greater access to meals. The result was increased attendance (which hopefully will translate to higher test scores).”
- * Brad Blunt, PMP, KY Department of Education, Division of School and Community Nutrition:
 - * “CEP has proven very beneficial to Kentucky’s LEAs and children: the advantages far outweigh the drawbacks.”

Flexibilities

- * Phased-in Breakfast implementation
- * Option to offer a daily meat/meat Alternate at breakfast
- * Allowed students to take just one-half cup of fruit or vegetables under OVS
- * Removed the starchy vegetable limit
- * Pushed out the second sodium target by an additional year
- * Lifted the weekly maximums on grain and meat/meat alternates
- * Allowed frozen fruit with added sugar
- * Clarified allowable whole grain-rich corn products
- * Provided two-year flexibility for schools that cannot obtain acceptable whole grain-rich pasta
- * Provided Smart Snack exemption for grain-only entrees served at breakfast

Tools for Schools

- * Your one-stop guide to nutrition standards for school meals and snacks
 - * Free nutrition materials, training, and recipes for school food service
 - * Smarter Lunchroom strategies
 - * Tips for offering more fruits, vegetables, and whole grain-rich foods
 - * Grant opportunities
 - * Best practices from other schools
 - * Regulations and policies

We want your feedback!

- * Keep sharing your best practices, challenges, and concerns

CEP Resources

- * USDA CEP Guidance Page:

<http://www.fns.usda.gov/school-meals/community-eligibility-provision>

- * Food Research and Action Center CEP Resources:

<http://frac.org/federal-foodnutrition-programs/national-school-lunch-program/community-eligibility/>

- * Center on Budget and Policy Priorities CEP Research and Guidance:

<http://www.cbpp.org/research/index.cfm?fa=topic&id=112>

Questions

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Thank You

- * CEP WORKS and is here to stay!
- * August 31st Deadline to elect for 2104-2015 school year
- * Figure out the numbers
- * Communication
- * Education and Operations
- * Resources are available online
- * Share your best practices and challenges